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Attorneys for Defendants
 ETHICON, INC. (on its own behalf and behalf of its
 Division, ETHICON WOMEN'S HEALTH &
 UROLOGY, and erroneously sued as GYNECARE,
 INC.); and JOHNSON & JOHNSON

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

LYNNETTE BLACKMAN, an individual,
 PAMELA AGUILAR, an individual,
 BETTY GIPE, an individual, EDITH
 ROBERTSON, an individual, LAURA
 VUJOVICH, an individual, ANNETTE
 CONSALVOS, an individual, and JOYCE
 FLYNN, an individual,

Plaintiffs,

v.

GYNECARE, INC. a California
 Corporation; ETHICON, INC. a New
 Jersey corporation, JOHNSON &
 JOHNSON, a New Jersey corporation,
 DOE MANUFACTURERS one through
 one hundred,

Defendants.

Case No. 4:10-CV-04741-PJH

**DECLARATION OF LISBETH A.
 WARREN IN SUPPORT OF MOTION TO
 SEVER UNDER RULE 21 AND
 TRANSFER UNDER 28 U.S.C. § 1406(a)
 OR, IN THE ALTERNATIVE, 28 U.S.C.
 § 1404(a)**

Date: April 6, 2011
 Time: 9:00 a.m.
 Courtroom: 3
 Judge: Hon. Phyllis J. Hamilton

Complaint Filed: October 20, 2010
Trial Date: Not set

I, LISBETH A. WARREN, declare that:

1. I am and have been an Assistant Secretary of Johnson & Johnson ("J&J"), a
 Defendant named in this lawsuit, since April 25, 2002. I have also served in the Office of the
 General Counsel since 1985, and am also currently an Assistant General Counsel of J&J. I

1 have personal knowledge of all of the facts set forth in this Declaration based upon information
 2 obtained from various sources, including my own personal knowledge and experience as an
 3 Assistant Secretary, J&J's corporate records, documents maintained by J&J in the regular course
 4 of business, and other information I obtained in the ordinary course of business. I make this
 5 declaration based on my own personal knowledge and reliable business records and other sources
 6 of information as to the following facts and circumstances, and I could and would competently
 7 testify to these matters if called as a witness.

8 2. I am familiar with the corporate structure of J&J. J&J is a company incorporated
 9 under the laws of the State of New Jersey, with its principal place of business in New Brunswick,
 10 New Jersey.

11 3. I am also familiar with the corporate structure of Ethicon, Inc. ("Ethicon"), a
 12 Defendant named in this lawsuit. Ethicon is a company incorporated under the laws of the State
 13 of New Jersey with its principal place of business in Somerville, New Jersey. Ethicon is a
 14 wholly-owned subsidiary of J&J and was at the time of the events and conduct identified in the
 15 Complaint.

16 4. Gynecare, Inc. ("Gynecare"), a Delaware company with operations in Menlo Park,
 17 California, was acquired by J&J on November 19, 1997. Gynecare merged out of existence and
 18 into Ethicon on January 3, 2000, and began operating as the Gynecare division of Ethicon. The
 19 Gynecare division of Ethicon ceased all of its operations in Menlo Park, California, on June 15,
 20 2001, when they were transferred to Somerville, New Jersey.

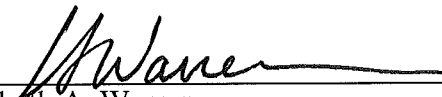
21 5. Ethicon Women's Health & Urology, previously operating as the Gynecare
 22 division of Ethicon, Inc., is an unincorporated division of Ethicon, with its administrative offices
 23 in Somerville, New Jersey. Ethicon Women's Health & Urology is the business unit responsible
 24 for the manufacturing and marketing of Gynecare-brand mesh products in the United States.

25 6. Among the Gynecare-brand mesh products manufactured and marketed by Ethicon
 26 Women's Health & Urology are seven products which may match plaintiffs' description of the
 27 products with which they were implanted:

28 (1) Prolift: Total;

- (2) Prolift: Anterior;
- (3) Prolift: Posterior;
- (4) Gynemesh PS;
- (5) TVT;
- (6) TVT-O; and
- (7) TVT-Secur.

I declare under penalty of perjury under the laws of California that the foregoing is true and correct and that this declaration is executed in New Brunswick, New Jersey, on February 28, 2011.


Lisbeth A. Warren

Jackson 6141457v1